

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	CC Docket No. 88-2
Filing and Review of Open)	Phase I
Network Architecture Plans)	

SIX-MONTH REPORT OF U S WEST COMMUNICATIONS, INC.

I. INTRODUCTION

On December 19, 1991, the Federal Communications Commission ("Commission") released a Memorandum Opinion and Order in the above-captioned proceeding,¹ wherein it established certain ongoing reporting requirements in order "to enable the Commission to monitor the BOCs' [Bell Operating Companies] progress in providing ONA [Open Network Architecture] capabilities to ESPs [Enhanced Service Providers]."² In compliance with that Order,³ U S WEST Communications, Inc. ("U S WEST"), files the following with the Commission:

¹ In the Matter of Filing and Review of Open Network Architecture Plans, Memorandum Opinion and Order, 6 FCC Rcd. 7646 (1991) ("Monitoring Order" or "Order").

² Id. at 7675 ¶ 64.

³ See id. at 7663 ¶ 35 n.56, 7664 ¶ 38 n.63. See also id. at 7677-79, Appendix B, summarizing the filing requirements.

1. A Nationwide Tariff Matrix (Attachment 1).
2. BOC ONA Special Report #5 Update (which contains updates of the Cross Reference Guide, Appendices A & B) (Attachment 2).
3. Hard copy portions of the ONA Services User Guide (Attachments 3 and 4).⁴
4. Diskettes of the ONA Services User Guide.⁵

The above-referenced items 1-3 are being filed only with the Commission.

The information contained in these submissions is available to interested persons by contacting U S WEST InterConnect Services at 1-800-544-7126.

II. FILINGS REQUIRED BY SUMMARY ORDERING PARAGRAPH

At the conclusion of the Commission's Order, it provided a summary of future filing requirements for the BOCs.⁶ U S WEST has chosen herein to utilize the Commission's basic "summary" as the outline by which we will make our responses.

⁴ Attachment 3 is the "Service Descriptions Section" of the ONA Services User Guide; Attachment 4 is the "Tariff Reference Section" of the same document.

⁵ These diskettes are being provided directly to the Policy Division of the Commission and include the following material from the ONA Services User Guide: Service Descriptions Section (one diskette), Special Report #5 (one diskette), Tariff Reference Section (one diskette), and Wire Center Deployment (two diskettes).

⁶ In response to the Commission's Further Notice of Proposed Rulemaking seeking comments on the elimination of some or all ONA reporting requirements, U S WEST proposed that the semi-annual reports and the Annual Report be consolidated into a new Annual ONA Report. The new Annual ONA Report would encompass all of the existing requirements of the semi-annual reports and streamlined information contained in its current ONA Annual Report. In the alternative, U S WEST proposed that new ONA services be posted on a web site which could eliminate the need for a paper report. U S WEST Comments filed Mar. 27, 1998. In the Matter of Computer III Further Remand Proceedings: Bell Operating Company Provision of Enhanced Services, 1998 Biennial Regulatory Review -- Review of Computer III and ONA Safeguards and Requirements, CC Docket Nos. 95-20 and 98-10, Further Notice of Proposed Rulemaking, FCC 98-8, rel. Jan. 30, 1998 ¶¶ 101-2.

This methodology was chosen for the Commission's ease of reference in assessing U S WEST's compliance.⁷

Requirement:

1. "Work through the IILC [Information Industry Liaison Committee] to develop one consolidated nationwide matrix of BOC ONA services and state and federal ONA tariffs, and file the matrix with the Commission."⁸

Response:

U S WEST worked through the NIIF and with the other BOCs to develop a combined nationwide tariff reference matrix.⁹ This document is included herewith as Attachment 1.

The nationwide matrix includes the generic name of the ONA service, which operating company offers the service in a particular jurisdiction, and whether the service is a Basic Service Element, Basic Serving Arrangement, or Complementary Network Service. The matrix also provides the name of the ONA service, as it is identified in a particular state or federal tariff, and a specific tariff reference.

Each BOC has reviewed the matrix to ensure the accuracy of the information contained therein pertaining to itself. The matrix identifies U S WEST's tariffs

⁷ U S WEST, in making this filing, does not concede that the Commission's jurisdiction to impose any ONA requirements on U S WEST is expanded by the filing itself. ONA remains a cooperative effort between the former BOCs and the Commission. U S WEST is not, through such cooperation, submitting to an expansion of the Commission's jurisdiction over U S WEST.

⁸ Monitoring Order, 6 FCC Rcd. at 7678, Appendix B.

⁹ The nationwide matrix was assembled by National Telecommunications Alliance, Inc. (NTA) at the request of the BOCs.

effective as of January 31, 1999, the effective date of the Tariff Reference Section of the ONA Services User Guide.¹⁰

Requirement:

2. "File computer diskettes and print outs of data regarding state and federal tariffs."¹¹

Response:

This information -- in print-out form -- is contained in the Tariff Reference Section of the ONA Services User Guide, which is included herein as Attachment 4. The information as contained on computer diskettes is being provided to the Policy Division of the Commission (see Response to Requirement 3, below), and is not included herein as an attachment.

Requirement:

3. "File a printed copy and computer diskette of the ONA Services User Guide."¹²

Response:

A printed copy of the January 31, 1999, ONA Services User Guide accompanies this filing as Attachment 3 (the "Services Description Section") and Attachment 4 (the "Tariff Reference Section").¹³ The ONA Services User Guide as it appears on diskette (which includes wire center deployment information) is being

¹⁰ The Tariff Reference Section of the ONA Services User Guide is discussed more fully below and is provided as Attachment 4.

¹¹ Monitoring Order, 6 FCC Rcd. at 7678, Appendix B.

¹² Id.

¹³ The Tariff Reference Section of the ONA Services User Guide provides the information required by the Commission's Monitoring Order. Id. at 7664 n.63.

provided to the Policy Division of the Commission coincident with this filing, as requested, and is not herein included as an attachment.

Requirement:

4. "File updated information contained in Appendix A of the January 31, 1991 Cross Reference Guide on ESP requests received and how they were addressed by the BOCs with details and matrices."¹⁴

Requirement:

5. "File updated information contained in Appendix B of the January 31, 1991 Cross Reference Guide on BOC responses to the requests and matrix."¹⁵

Response:

Appendices A & B of the Cross Reference Guide, updated as of March 31, 1999, are identified as BOC ONA Special Report #5. A copy of this Special Report is provided as Attachment 2.

Requirement:

6. "File updated information contained in Appendix C of the January 31, 1991 Cross Reference Guide on services offered by the BOC in response to the requests."¹⁶

Response:

This updated information is contained in the ONA Services User Guide, "Service Descriptions Section," attached herein as Attachment 3.

¹⁴ Id. at 7678, Appendix B.

¹⁵ Id.

¹⁶ Id. at 7679, Appendix B.

III. CONCLUSION

As set forth herein, U S WEST makes the appropriate filings as required by the Commission's Monitoring Order.

DATED: March 31, 1999

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